

**AFFIDAVIT OF SPECIAL AGENT GREGORY SQUIRE IN SUPPORT OF
AN APPLICATION FOR A CRIMINAL COMPLAINT**

I, Gregory D. Squire, being duly sworn, depose and state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. I have been employed as a Special Agent of the Department of Homeland Security (DHS), Homeland Security Investigations (HSI) since 2007, and am currently assigned to the Boston Field office. As part of my duties, I am authorized to investigate violations of the laws of the United States, including but not limited to criminal violations relating to the sexual exploitation of children, child pornography, coercion and enticement, and transportation of minors, including but not limited to violations of 18 U.S.C. §§ 2422, 2423, 2251, and 2252A. For the past five years I have specialized in dark web investigations, with a focus on child sexual abuse and child pornography websites. I am an active member of a multinational, multi-agency working group that coordinates national and international operations to combat child exploitation on the dark web and to rescue children from abusers who are active on the dark web. As an agent in the Boston Field Office, I frequently participate in the execution of search warrants involving child exploitation and pornography, and I work closely with HSI forensic specialists throughout these investigations and prosecutions.
2. I submit this affidavit in support of a criminal complaint charging Carl AUGUSTE, YOB 1990, of Roslindale, Massachusetts, with one count of receiving child pornography, in violation of 18 U.S.C. § 2252A(a)(2)(A), and one count of possession of child pornography, in violation of 18 U.S.C. § 2252A(a)(5)(B).
3. The facts in this affidavit come from my personal observations and review of records, my training and experience, and information obtained from other agents and witnesses. This

affidavit is intended to show merely that there is probable cause to secure a criminal complaint and does not set forth all of my knowledge about this matter. Where statements of others are set forth in this affidavit, they are set forth in substance and in part.

STATEMENT OF PROBABLE CAUSE

4. On February 25, 2020, at approximately 6:10 a.m., HSI agents, with the assistance of local law enforcement, executed a federal search warrant authorizing them to search a residential address located in Roslindale, Massachusetts for evidence, fruits, and instrumentalities of violations of 18 U.S.C. § 2252A.
5. Carl AUGUSTE was present in the home. He was advised of and executed a written waiver of his *Miranda* rights and agreed to speak with agents on scene. The interview was recorded; unless otherwise indicated, all statements set forth below are summary in nature.
6. AUGUSTE admitted to agents that he has seen child pornography on the internet, and visited child pornography web sites, both on the open web and the dark web. Initially, he denied saving child pornography, but later, when agents asked him if they would find child pornography on a thumb drive located in the apartment, he acknowledged that they would.
7. AUGUSTE told agents that he had downloaded the Tor browser a couple of years prior, because he had heard that it was a way to visit websites anonymously. When agents asked AUGUSTE if he was familiar with particular child pornography sites on the dark web, AUGUSTE indicated to agents that he had visited and had an account with one particular site, which he identified by name. I am personally familiar with that particular site, and

know that it was an online forum dedicated to the sexual exploitation of minor and/or prepubescent males.¹

8. Agents located one HP desktop computer in the home. AUGUSTE told agents that he was the only person in the household to use the computer, and that it was password protected. He gave agents the password to the computer.
9. During the course of the search, AUGUSTE directed agents to a 200 gigabyte Seagate external hard drive located on the floor of the living room, next to the computer. The drive was manufactured in Thailand.
10. Agents then conducted an on-scene preliminary forensic review of the computer. During the review, agents observed evidence that another removable storage device had been connected to the computer within the previous week. Agents asked AUGUSTE where that drive was, and AUGUSTE directed them to look inside a particular box in the general area of the computer. Agents located a 64 gigabyte Kingston thumb drive in the box.
11. During the preliminary forensic review of the Seagate external hard drive, agents observed at least hundreds of images depicting child pornography, all located in one primary folder. The majority of the images appeared to depict infants and toddlers engaged in sexually explicit conduct. Agents also observed approximately 1,000 videos containing child pornography on the Kingston thumb drive. Those videos appeared to primarily depict boys engaged in sexually explicit conduct, and included children as young as babies.

¹ The name of the website is known to law enforcement. Investigation into the users of the website remains ongoing and disclosure of the name of the website would potentially alert active website users to the investigation, potentially provoking users to notify other users of law enforcement action, flee, and/or destroy evidence

12. Included among the child pornography files were the following images:²
- a. 290.jpg: This image depicts an adult male inserting his erect penis into the anus of a male child who, based on my role in the investigation that led to the identification of the offender and child, I know to be two years old at the time the photograph was produced. The child is lying on his side on a sofa and his face is visible in the image.
 - b. Oyo-g-07-01.jpg: This image depicts an erect adult penis pressing into the anus of a child who, based on my role in the investigation that led to the identification of the offender and child, I know to be 11 days old at the time the photograph was produced. I know that this image is available on the dark web.
13. The HP computer, Seagate external hard drive, Kingston thumb drive, and other devices seized pursuant to the warrant are currently being transported to the HSI forensic lab. Analysis remains ongoing.

CONCLUSION

14. Based on all of the foregoing information, I submit that there is probable cause to believe that:
- a. On various dates between in or about February 2018 and on or about February 25, 2020, AUGUSTE knowingly received, and attempted to receive, any child pornography, as defined in Title 18, United States Code, Section 2256(8), that had been mailed, and using any means and facility of interstate and foreign commerce shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(2)(A); and

² The images are available for the Court's review.

- b. On or about February 25, 2020, AUGUSTE knowingly possessed material that contained one and more images of child pornography, as defined in Title 18, United States Code, Section 2256(8), that involved a prepubescent minor and a minor who had not attained 12 years of age, and that had been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that had been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, in violation of 18 U.S.C. § 2252A(a)(5)(B).

Sworn to under the pains and penalties of perjury,


Special Agent Gregory D. Squire
Homeland Security Investigations



SUBSCRIBED and SWORN to before me on February 25, 2020.


HONORABLE M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE

I have reviewed the screen shots referenced in Paragraph 12 above, and I find probable cause to believe that the screen shots depict minors engaged in sexually explicit conduct. The Affiant shall preserve said images for the duration of the pendency of this matter, including any relevant appeal process.


HONORABLE M. PAGE KELLEY
UNITED STATES MAGISTRATE JUDGE